

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA**

MARILYN RAE BASKIN, *et al.*, )  
   ) )  
Plaintiffs,                         ) )  
v.                                    ) Civil Action No.:  
PENNY BOGAN, in her official capacity as ) 1:14-cv-00355-RLY-TAB  
BOONE COUNTY CLERK, *et al.*, ) )  
                                       ) )  
Defendants.                         ) )

**SECOND UNOPPOSED MOTION TO EXTEND TIME TO FILE FOR  
ATTORNEYS' FEES AND COSTS**

Plaintiffs, through their undersigned counsel, state as follows:

1. Pursuant to this Court's July 3, 2014 Order, Plaintiffs are to file their petition for attorneys' fees and costs on, or before, 95 days after the mandate in this case was issued by the Seventh Circuit or 35 days after proceedings in the United States Supreme Court are resolved, whichever date is later.
2. The United States Supreme Court denied Defendants' petition for a writ of certiorari on October 6, 2014, and the Seventh Circuit issued its mandate on October 7, 2014. *See Baskin v. Bogan*, 766 F.3d 648 (7th Cir.), *cert. denied*, 135 S.Ct. 316 (Oct. 6, 2014).
3. Plaintiffs' petition for attorneys' fees and costs therefore is due on January 12, 2015 (the first day after the 95th day that is not a Saturday, Sunday or legal holiday).
4. On December 12, 2014, Plaintiffs' counsel submitted a fee and cost proposal to Defendants.
5. Counsel for Plaintiffs and Defendants have conferred about the proposal and are currently actively engaged in good-faith negotiations regarding attorneys' fees and costs in this matter.

6. Accordingly, Plaintiffs request an extension of time to, and until, March 11, 2015, to submit their petition for attorneys' fees and costs in the hope that the parties can reach an agreement.

7. Counsel for Plaintiffs has consulted with Thomas Fisher from the Office of the Attorney General, who advised that there is no objection to this motion.

WHEREFORE, Plaintiffs request that the time for filing for reasonable attorneys' fees be extended to, and until, March 11, 2015, and for all other proper relief.

Dated: January 6, 2015

Respectfully submitted,

Camilla B. Taylor  
LAMBDA LEGAL DEFENSE &  
EDUCATION FUND, INC.  
105 West Adams, Suite 2600  
Chicago, Illinois 60603  
(312) 663 4413  
ctaylor@lambdalegal.org

Paul D. Castillo  
LAMBDA LEGAL DEFENSE &  
EDUCATION FUND, INC.  
3500 Oak Lawn Ave., Suite 500  
Dallas, Texas 75219  
(214) 219-8585, ext. 242  
pcastillo@lambdalegal.org

*/s/ Jordan M. Heinz*

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Jordan M. Heinz  
Brent P. Ray  
Dmitriy G. Tishyevich  
Melanie MacKay  
KIRKLAND & ELLIS LLP  
300 North LaSalle Street  
Chicago, Illinois 60654  
(312) 862 2000  
jordan.heinz@kirkland.com  
brent.ray@kirkland.com  
dmitriy.tishyevich@kirkland.com  
melanie.mackay@kirkland.com

Barbara J. Baird  
LAW OFFICE OF BARBARA J. BAIRD  
445 North Pennsylvania Street, Suite 401  
Indianapolis, Indiana 46204-0000  
(317) 637-2345  
bjbaird@bjbairdlaw.com

**CERTIFICATE OF SERVICE**

I, Jordan M. Heinz, an attorney, certify that on January 6, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following counsel:

Thomas M. Fisher  
OFFICE OF THE ATTORNEY GENERAL  
302 West Washington Street  
IGCS - 5th Floor  
Indianapolis, IN 46204  
(317) 232-6255  
Fax: (317) 232-7979  
Email: tom.fisher@atg.in.gov

*Counsel for Defendants Greg Zoeller, in his official capacity as Indiana Attorney General, and William C. Vanness II, M.D., in his official capacity as the Commissioner, Indiana State Department of Health*

Robert V. Clutter  
KIRTLEY, TAYLOR, SIMS, CHADD & MINNETTE, P.C.  
117 W. Main Street  
Lebanon, IN 46052  
765-483-8549  
Fax: 765-483-9521  
Email: bclutter@kirtleytaylorlaw.com

*Counsel for Defendant Penny Bogan, in her official capacity as Boone County Clerk*

Elizabeth A. Knight  
PORTER COUNTY ADMINISTRATIVE CENTER  
155 Indiana Avenue  
Suite 205  
Valparaiso, IN 46383  
(219) 465-3329  
Fax: (219) 465-3362  
Email: eknight@porterco.org

*Counsel for Defendant Karen M. Martin, in her official capacity as Porter County Clerk*

Nancy Moore Tiller  
NANCY MOORE TILLER & ASSOCIATES  
11035 Broadway  
Suite A  
Crown Point, IN 46307  
219-662-2300  
Fax: 219-662-8739  
Email: nmt@tillerlegal.com

*Counsel for Defendant Michael A. Brown, in his official capacity as Lake County Clerk*

Darren J. Murphy  
Assistant Hamilton County Attorney  
694 Logan St.  
Noblesville, IN 46060  
317-774-4212  
Fax: 317-776-2369  
Email: dmurphy@ori.net

*Counsel for Defendant Peggy Beaver, in her official capacity as Hamilton County Clerk*

/s/ Jordan M. Heinz